

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE)	
COMPANY, JOHN HANCOCK)	
VARIABLE LIFE INSURANCE)	
COMPANY, and INVESTORS)	
PARTNER LIFE INSURANCE)	
COMPANY,)	
)	
Plaintiffs,)	CIVIL ACTION NO. 03-12501-DPW
)	
v.)	
)	
ABBOTT LABORATORIES,)	
)	
Defendant.)	
)	

**PLAINTIFFS' MOTION FOR
IMPOUNDMENT OF CONFIDENTIAL INFORMATION**

Pursuant to Local Rule 7.2, Plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company (collectively, "John Hancock" or the "Plaintiffs") hereby move this Court for leave to file the following documents under Seal:

1. Plaintiffs' Motion For Summary Judgment;
2. Statement of Undisputed Facts in Support of Plaintiffs' Motion for Summary Judgment;
3. Plaintiffs' Memorandum Of Law In Support Of Their Motion For Summary Judgment;
4. Affidavit of Stephen J. Blewitt (and accompanying Exhibits 1-10); and

5. Affidavit of Karen Collari Troake, Esq. (and accompanying Exhibits 11-35).

The material to be impounded contains confidential information of Abbott Laboratories (“Abbott”) and/or John Hancock and has been designated “Confidential” or “Highly Confidential” pursuant to the Stipulated Protective Order executed by the parties and entered by the Court in this matter on May 12, 2004 (“Stipulated Protective Order”).

John Hancock has consulted with Abbott pursuant to Local Rule 7.1(A)(2), and Abbott concurs that the above documents should be filed in compliance with the provisions of the Stipulated Protective Order and Local Rule 7.2.

John Hancock respectfully requests that the Confidential Information that is the subject of this Motion be impounded until further Order of the Court.

Respectfully Submitted,

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE
LIFE INSURANCE COMPANY, AND
INVESTORS PARTNER LIFE INSURANCE
COMPANY,

By Their Attorneys,

/s/ Karen Collari Troake
Brian A. Davis (BBO No. 546462)
Michael Arthur Walsh (BBO No. 514875)
Karen Collari Troake (BBO No. 566922)
Stacy Blasberg (BBO No. 657420)
CHOATE, HALL & STEWART
Exchange Place
53 State Street
Boston, Massachusetts 02109-2891
(617) 248-5000

Dated: September 29, 2004.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

The undersigned hereby certifies that counsel for John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company has conferred with Abbott Laboratories' counsel and that Abbott Laboratories has no objection to impoundment of the documents referenced in the attached Motion.

/s/ Karen Collari Troake
Karen Collari Troake

3745215v1